

AO91 (Rev. 8/01) Criminal Complaint

United States District Court

SOUTHERN

DISTRICT OF

TEXAS

APR 29 2013 CLR

UNITED STATES OF AMERICA

CRIMINAL COMPLAINT

U.S. District Court
Laredo Division

Case Number: 5:13mj 657-1

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3① Robert MARTINEZ
Laredo, Texas
United States② Sara Alicia Rangel Espinoza
Laredo, Texas
United States③ Emir Espinoza
Laredo, Texas
United States

(Name and Address of Defendants)

I, the undersigned complainant state that the following is true and correct to the best of my

knowledge and belief. On or about April 27, 2013 in Laredo, TX Webb County, in

(Date)

the Southern District of Texas, Robert MARTINEZ,Sara Alicia Rangel Espinoza and Emir Espinoza defendant(s),

Three (3) U.S. Citizens, did unlawfully harbor Dominican Republic Nationals Victor Manuel MARTINEZ-DIAZ and Pedro Chanel CASTELLANOS-POLANCO along with four (4) others, by means of a mobile home within the Southern District of Texas, knowing or in reckless disregard of the fact that said aliens had come to, entered, or remained in the United States in violation of law.

in violation of Title 8 United States Code, Section(s) 1324I further state that I am a(n) ICE Special Agent and that this complaint is based on the

Official Title

following facts: based on statements of the accused and records of the Immigration & Naturalization Service.

Continued on the attached sheet and made a part of this complaint:

☒ Yes☐ No

Signature of Complainant

Special Agent James Chang

Printed Name of Complainant

Sworn to before me and signed in my presence,

April 29, 2013

Date

at

Laredo, Texas

City and State

J. Scott HackerU.S. Magistrate Judge

Name and Title of Judicial Officer

Signature of Judicial Officer

United States of America

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vs

Robert MARTINEZ
Sara Alicia Rangel Espinoza
Emir Espinoza
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[CONT OF BASIS OF COMPLAINT]

As per Laredo Police Department (LPD) Officer David Hinojosa, On April 27, 2013, at approximately 1:00 pm, Laredo Police Department (LPD) Officers received a call from dispatch that there were several people being dropped off at a mobile home off of Mines Rd and that someone in the group may have a gun. LPD Officers arrived on scene and saw three (3) subjects run into the house, after the police have announced their presence and told them not to move. LPD Officers secured the scene and saw three (3) different subjects leave the mobile home.

LPD Officers conducted a safety and welfare check of the mobile home and discovered a handgun and six (6) individuals hiding inside a room. At this time, Border Patrol and Homeland Security Investigations Agents were contacted and arrived on scene and conducted an immigration inspection of the six (6) individuals, who were determined to be Undocumented Aliens (UDA). All subjects were placed under arrest and taken to the station for processing.

As per a sworn statement given by Emir ESPINOZA, Robert MARTINEZ was the person who coordinated the arrival of the UDAs to the mobile home and ESPINOZA knew that they were UDAs. As per a sworn statement given by Sara Alicia RANGEL-ESPINOZA, Robert MARTINEZ has harbored UDAs in the past and told her that UDAs were going to arrive at the mobile home. RANGEL-ESPINOZA also admitted to cooking food for the UDAs on at least one occasion.

Both RANGEL-ESPINOZA and Emir ESPINOZ admitted to residing at the mobile home and knowing the illegal status of the UDAs.

As per Material Witness interviews, it was determined that the three (3) subjects who came out of the mobile home after LPD Officers secured the scene, later identified as Robert MARTINEZ, Sara Alicia RANGEL-ESPINOZA, and Emir ESPINOZA, were present inside the mobile home during the duration of their stay.

Robert MARTINEZ, Sara Alicia RANGEL-ESPINOZA, and Emir ESPINOZA was charged with 8 USC 1324 (harboring undocumented aliens). Victor Manuel MARTINEZ-Diaz and Pedro Chanel CASTELLANOS-POLANCO will be held as material witnesses for this smuggling case.